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BEFORE THE ARIZONA CORPORATION COMMISSION

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AZ CORP COMMISSION  
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**IN THE MATTER OF U S WEST  
COMMUNICATIONS, INC.'S  
COMPLIANCE WITH § 271 OF THE  
TELECOMMUNICATIONS ACT OF  
1996**

**Docket No. T-00000A-97-0238**

**QWEST'S POST-WORKSHOP  
BRIEF REGARDING  
RELATIONSHIP MANAGEMENT  
EVALUATION ISSUES**

Qwest Corporation ("Qwest") respectfully submits this brief regarding the Final Report Relationship Management Evaluation, Draft Version 2.0 ("RME Report"), and related issues raised at the Relationship Management Evaluation workshop.

**I. INTRODUCTION**

The Relationship Management Evaluation ("RME") was conducted as part of the Arizona Corporation Commission's ("Commission" or "ACC") test of Qwest's operational support systems (the "OSS Test" or the "Test"). Cap Gemini Ernst & Young ("CGE&Y") is conducting the OSS Test at the direction of the ACC Staff.

The Master Test Plan ("MTP") states that the RME:

is a "process test" to ensure that Qwest's system and/or process change control methods are appropriately handled and effectively communicated to CLECs, based on the defined change control procedures. *This test focuses on the procedures Qwest uses to interact with CLECs.*<sup>1</sup>

<sup>1</sup> MTP section 3.3.4.

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The MTP requires CGE&Y to obtain information regarding CLEC, Pseudo-CLEC, and Qwest experiences relating to their business relationships, review and evaluate documents on Qwest's web site, and document its findings. Based on that information, CGE&Y was required to reach conclusions. CGE&Y has conducted the RME in compliance with all of those requirements.

The CLECs, and AT&T in particular, nevertheless complain that CGE&Y should have conducted the RME differently, in accordance with AT&T's own interpretation of the MTP's requirements. As set forth below, the MTP does not support these complaints.

## **II. CGE&Y SATISFIED THE MTP REQUIREMENTS IN PERFORMING THE RELATIONSHIP MANAGEMENT EVALUATION.**

The MTP describes the scope of the five RME component evaluations in section 7.2 (emphasis added):

### **CLEC Account Establishment**

This evaluation will examine methods and procedures provided by Qwest for establishing a new CLEC customer. The evaluation will focus on the *available documentation accessible to a CLEC business* and on consultative assistance that Qwest provides to a CLEC in getting additional documentation.

### **CLEC Account Management**

The CLEC Account Management evaluation will examine the methods, procedures and actions *provided by Qwest* for managing their business relationship with the CLECs. The evaluation will examine Responses to Account inquiries, Help Desk Call Processing, Help Desk call closures, Help Desk Status Tracking, Problem Escalation, Forecasting, and Communications.

### **CLEC Training Evaluation**

The scope of the CLEC Training Evaluation is to evaluate the availability of training schedules, the frequency of training on the various areas where training is offered, the detail of the training curriculum and the effectiveness of the training content.

## **Interface Development**

This evaluation will examine the documentation, specification and consultative assistance *provided by Qwest to CLECs* for use in building an EDI interface or installing IMA. This test will also include an evaluation of the test environment Qwest provides CLECs for pre-testing their EDI interfaces.

## **Qwest OSS Change Management Process Evaluation**

The Qwest OSS Change Management Process will be examined to ensure that Qwest's systems and/or processes for change management are appropriately and effectively conducted and communicated to the CLEC's, *based on the defined change management procedures*. The Change Management (CM) Evaluation will evaluate Qwest Methods and Procedures used to communicate with the CLECs in regard to Qwest's OSS performance and system updates, and by which it processes changes. The result of this effort will be the evaluation of the CM process, validation that it works as stated, and a Change Management Report stating the findings.

Essentially, CGE&Y was tasked with collecting information and documenting its results. The MTP vests solely in CGE&Y, as the Test Administrator, the responsibility for analyzing the test results, applying the collective experience and judgment of its personnel, and reporting its evaluation of those results.<sup>2</sup> As set forth below, that is exactly what CGE&Y did.

### **A. CGE&Y complied with the MTP's requirement to document CLEC experiences by obtaining CLEC input through questionnaires.**

The MTP provides that CGE&Y was to interview CLEC, Qwest, and/or Pseudo-CLEC representatives for the various components of the RME. For example, representatives from CLECs, Qwest, and the Pseudo-CLEC were to be interviewed for the CLEC Account Establishment Evaluation, but only Pseudo-CLEC representatives were to be interviewed for the CLEC Training Evaluation.<sup>3</sup> Regardless of which representatives were to be interviewed, the

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<sup>2</sup> MTP section 9.3.

<sup>3</sup> MTP sections 7.2.1 and 7.2.3.

entrance criteria for all of the evaluations specified that interview questionnaires were required and the exit criteria specified that those questionnaires be completed.<sup>4</sup>

These entrance and exit criteria demonstrate that the purpose of the interviews was simply to document CLEC experiences. Indeed, the MTP expressly states that interviews are to be performed "to document the experiences" of the interviewees.<sup>5</sup> CGE&Y followed the MTP's mandate by performing interviews via written questionnaires to document the CLECs' experiences.<sup>6</sup> AT&T claims that additional oral interviews were required to supplement the information provided in CLEC responses to questionnaires.

As stated above, CGE&Y's use of written questionnaires to solicit CLEC input is consistent with the MTP's mandate to document CLEC experiences. In some cases, these questionnaires took the place of in-person interviews.<sup>7</sup> CGE&Y diligently followed up with CLECs to encourage them to respond to these questionnaires. CGE&Y sent two rounds of follow up emails encouraging CLECs to respond to the questionnaires.<sup>8</sup> Moreover, both CGE&Y and Staff proactively contacted CLECs to encourage them to provide input.<sup>9</sup>

However, CLEC input was by no means limited to written responses to these questionnaires. In addition to the opportunity to provide written input, CLECs were invited to call CGE&Y to provide further comment.<sup>10</sup> CGE&Y also contacted CLECs to conduct informal interviews.<sup>11</sup> In some instances, CGE&Y conferred with CLECs to clarify specific answers on

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<sup>4</sup> MTP sections 7.2.1.1, 7.2.1.2, 7.2.2.1, 7.2.2.2, 7.2.3.1, 7.2.3.2, 7.2.4.1, 7.2.4.2, 7.2.5.1, 7.2.5.2.

<sup>5</sup> See, e.g., MTP section 7.2.1 and 7.2.2.

<sup>6</sup> The questionnaires "took the place of in-person interviews in many instances where in-person or telephone interviews were either impractical or impossible due to scheduling problems." RME Report at 3.

<sup>7</sup> RME Workshop Transcript Vol. I 17:15-16.

<sup>8</sup> RME Workshop Transcript Vol. I 107:14-16.

<sup>9</sup> RME Workshop Transcript Vol. I 107:17-20.

<sup>10</sup> RME Workshop Transcript Vol. I 105:16-18.

<sup>11</sup> RME Workshop Transcript Vol. I 18:2-3.

questionnaires.<sup>12</sup> In other instances, CLECs approached CGE&Y requesting to discuss specific issues.<sup>13</sup> CGE&Y also obtained information through informal conversations with CLECs at Change Management Process and other meetings.<sup>14</sup>

The testimony at the workshop reflects that CGE&Y expended significant effort to solicit input from CLECs, including making offers on a regular basis to all CLECs to "talk to us about any and all issues."<sup>15</sup> Some of the information provided by CLECs pursuant to these offers resulted in the issuance of Incident Work Orders ("IWOs").

Indeed, AT&T admitted that CGE&Y did "everything it could" to get CLECs to respond to the questionnaires.<sup>16</sup> AT&T further concedes that Test Advisory Group ("TAG") discussions and meeting minutes "certainly reflect an attempt to get the questionnaires filled out."<sup>17</sup> The bottom line, as AT&T admits, is that "[n]o [CLEC] was precluded from giving any input on any subject."<sup>18</sup>

CGE&Y reasonably exercised its professional judgment in deciding to use written questionnaires as a primary means of satisfying the MTP's mandate to document CLEC experiences. Given AT&T's admission that CGE&Y did everything it could do to obtain full responses to those questionnaires, AT&T should be estopped from claiming that additional oral interviews were required to supplement the written responses to questionnaires.

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<sup>12</sup> RME Workshop Transcript Vol. I 105:3-5.

<sup>13</sup> RME Workshop Transcript Vol. I 105:19-24.

<sup>14</sup> RME Workshop Transcript Vol. I 179:6-15.

<sup>15</sup> RME Workshop Transcript Vol. II 382:16-383:7.

<sup>16</sup> RME Workshop Transcript Vol. I 107:25-108:2.

<sup>17</sup> RME Workshop Transcript Vol. I 108:10-12.

<sup>18</sup> RME Workshop Transcript Vol. II 382:22-23.

**B. CGE&Y complied with the MTP's mandate to focus on Qwest's interaction with CLECs rather than Qwest's internal processes.**

The MTP directs CGE&Y to evaluate Qwest's interaction with CLECs: "This test focuses on the procedures Qwest uses to interact with CLECs."<sup>19</sup> Accordingly, the MTP requires CGE&Y to evaluate the documentation Qwest provides to CLECs as part of that interaction.

The MTP provides as follows:

The CLEC Account Establishment Evaluation will examine *published methods and procedures*.<sup>20</sup>

The CLEC Account Management Evaluation will evaluate the methods, procedures, and actions *provided by Qwest* for managing business relationships with CLECs.<sup>21</sup>

The CLEC Training Evaluation is based on documentation that is *readily available to CLECs*.<sup>22</sup>

The Interface Development Evaluation document review and evaluation focuses on *information Qwest makes available to CLECs*.<sup>23</sup>

The Change Management Process Evaluation monitors Qwest's adherence to *published methods and procedures*.<sup>24</sup>

In detailing each of these evaluations, the MTP describes the documentation to be reviewed and evaluated in precisely the same way: documentation to be retrieved from Qwest's web site or otherwise provided by Qwest.<sup>25</sup>

These provisions leave no question that the documentation CGE&Y was tasked with reviewing was the external documentation Qwest provides to CLECs. Nonetheless, AT&T repeatedly asked CGE&Y why it had not reviewed Qwest's internal documentation. In response,

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<sup>19</sup> MTP section 3.3.4.

<sup>20</sup> MTP section 7.2.1 (emphasis added).

<sup>21</sup> MTP section 7.2.2 (emphasis added).

<sup>22</sup> MTP section 7.2.3 (emphasis added).

<sup>23</sup> MTP section 7.2.4 (emphasis added).

<sup>24</sup> MTP section 7.2.5 (emphasis added).

CGE&Y repeatedly stated that it had complied with the MTP mandate by: (1) examining Qwest's business processes, procedures, communications, and communications methods "that involve direct contact with" CLECs;<sup>26</sup> (2) "look[ing] at . . . the end result of [Qwest's internal] process";<sup>27</sup> (3) "evaluat[ing] the experience at the contact point" between CLECs and Qwest.<sup>28</sup>

However, CGE&Y's review was not limited to external documentation. Through data requests, CGE&Y also obtained and reviewed specific information regarding Qwest's internal processes, procedures, or flowcharts during the course of performing root cause analysis in processing IWOs.<sup>29</sup>

Thus, CGE&Y accurately described the MTP's mandate as requiring CGE&Y to evaluate how Qwest does business with the CLECs based on publicly available information, the CLECs' perspective, and CGE&Y's professional opinion.<sup>30</sup> That is precisely what CGE&Y did.

**C. CGE&Y satisfied the MTP's requirement to evaluate Qwest's CLEC training program.**

A substantial amount of workshop time was devoted to CGE&Y's evaluation of Qwest's CLEC training. As WorldCom noted, "Qwest's CLEC training efforts progressed from unsatisfactory to satisfactory" during the course of the RME.<sup>31</sup> The RME Report states:

When the evaluation began, Qwest's formal CLEC training program consisted of only two instructor-lead classes and some self-paced online training. In February 2001, Qwest began offering an extensive catalog of product, systems, and process-related courses to CLECs. This catalog continues to grow.

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<sup>25</sup> MTP sections 7.2.1, 7.2.2, 7.2.3, 7.2.4, 7.2.5.

<sup>26</sup> RME Workshop Transcript Vol. II 263:7-15; RME Report at 3.

<sup>27</sup> RME Workshop Transcript Vol. II 282:12-21.

<sup>28</sup> RME Workshop Transcript Vol. II 286:3-14.

<sup>29</sup> RME Workshop Transcript Vol. II 295:15-296:2.

<sup>30</sup> RME Workshop Transcript Vol. I 137:24-38:7.

<sup>31</sup> RME Workshop Transcript Vol. II 310: 1-5; RME Report at 6.

Adverse findings related to training all occurred prior to Qwest's 2001 roll-out of its new training program, and specifically related to the lack of available courses and the quality of one of the two existing courses. These findings have all been closed.

CGE&Y's findings reflect the tremendous progress Qwest has made in improving its CLEC training program. Because all of the initial input CGE&Y received related to the old program, after the roll out of Qwest's new CLEC training program, CGE&Y requested additional input from CLECs regarding the new training program.<sup>32</sup> CGE&Y also received positive feedback on Qwest's new IMA hands-on class from people who attended the class, including CGE&Y personnel.<sup>33</sup> In addition, CGE&Y reviewed completed course assessment sheets reflecting positive feedback.<sup>34</sup> This overwhelmingly positive evidence regarding Qwest's training program should allay any remaining CLEC concerns.

**D. CGE&Y satisfied the MTP's provisions regarding analysis of Qwest's Help Desk.**

AT&T focused on IWO 1145-1 at length during the workshop. Based on information contained in the Pseudo-CLEC's Help Desk Relationship Report for 271 Test Generator -- Version 4.1 ("Help Desk Report"), CGE&Y issued IWO 1145-1 relating to the Help Desk's handling of calls. In the IWO, CGE&Y provided illustrative examples of issues related to the Help Desk's response to calls, but did not provide detail regarding all of the 549 referred to in the IWO.<sup>35</sup> Qwest responded to the specific examples cited, but could not respond to all of the issues without additional detail. For example, the information provided did not contain enough

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<sup>32</sup> RME Workshop Transcript Vol. II 323:18-24.

<sup>33</sup> RME Workshop Transcript Vol. II 310:10-18.

<sup>34</sup> RME Workshop Transcript Vol. II 314:22-315:5.

<sup>35</sup> RME Workshop Transcript Vol. II 222:5-224:2.

information to determine whether a two-hour, 24-hour, or 48-hour commitment for a return call or for closure of the ticket applied.<sup>36</sup>

In order to address a specific issue raised in the IWO regarding Qwest's failure to meet a two-hour commitment for closure of escalation tickets, Qwest produced three months of commercial data demonstrating that Qwest had met its two-hour commitment for 92.28 percent of calls during that period.<sup>37</sup> Understanding that Qwest could not respond with explanations regarding all 549 calls, CGE&Y noted that its purpose in issuing the IWO was to "bring to the surface and document an experience that CLECs may encounter when trying to conduct business with Qwest," and closed the IWO.<sup>38</sup> AT&T complained that IWO 1145-1 should not have been closed without more analysis.

Based on the information contained in the IWO, no additional analysis was required to justify CGE&Y's decision to close IWO 1145-1. The vast majority of the 549 calls would not have required an escalation ticket with a commitment for a return call or closure.<sup>39</sup> The IWO stated that 82 of the 549 calls -- approximately 15% -- were escalated. These 82 escalated calls would have resulted in issuance of an escalation ticket with a commitment to resolve the problem.<sup>40</sup> Based on the data provided by the Pseudo-CLEC in its Help Desk Report, many of these calls involved standard issues that would have been resolved immediately.<sup>41</sup> Assuming that as many as half of these calls involved issues that required more than two hours to resolve, the information in the IWO is consistent with Qwest's commercial data that indicate that Qwest meets its two-hour commitment approximately 92% of the time.

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<sup>36</sup> RME Workshop Transcript Vol. II 236:17-237:10; 238:8-14; 245:10-246:3.

<sup>37</sup> RME Workshop Transcript Vol. II 223:10-16.

<sup>38</sup> RME Workshop Transcript Vol. II 223:22-224:2.

<sup>39</sup> RME Workshop Transcript Vol. II 246:4-15.

<sup>40</sup> RME Workshop Transcript Vol. II 246:7-10.

The issues AT&T raised identify a situation where the Pseudo-CLEC's experience does not match the aggregate CLEC experience. In order to resolve any lingering concerns over the closure of IWO 1145-1, Qwest agreed at the workshop to provide four additional months of raw data reflecting the CLECs' actual commercial experience to allow CGE&Y to independently verify the Help Desk's performance.<sup>42</sup> CGE&Y agreed to review the data and determine how to proceed.<sup>43</sup> This process will fully address AT&T's concerns regarding IWO 1145-1.

AT&T also complained that Qwest's resolution to the possible Help Desk training deficiencies raised in IWO 1146 should be validated through the retest process.<sup>44</sup> At the TAG meeting held October 15, 2001, the TAG determined that IWO 1146 would be retested, thus fully addressing AT&T's concern regarding this IWO.

**E. CGE&Y satisfied the MTP's requirement to analyze Qwest's Change Management Process.**

Qwest is currently redesigning its Change Management Process ("CMP") in extensive collaboration with CLECs. Qwest and interested CLECs have formed a redesign team for this purpose. The redesign team decided to use the Ordering and Billing Forum's ("OBF") guidelines for change management as a starting point for redesigning Qwest's CMP. As the redesign team has reached agreement regarding various aspects of the CMP, it is documenting those agreements by redlining the OBF's guideline document.

The team agreed to refer to the redlined document as the "interim draft master redlined document." The team agreed that the terms "interim" and "draft" have special significance. The agreements presented in the interim draft master redlined document are interim agreements in

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<sup>41</sup> RME Workshop Transcript Vol. II 246:10-15.

<sup>42</sup> RME Workshop Transcript Vol. II 245:2-9; 247:13-16.

<sup>43</sup> RME Workshop Transcript Vol. II 249:4-250:4.

that the team agreed that Qwest may implement those agreements as soon as practicable. At the same time, the agreements remain in draft form because they are subject to change throughout the redesign process. At the end of the redesign process, the team will review the document as a whole and make necessary changes to ensure that the discrete agreements reached regarding different issues fit together into a cohesive and integrated whole.

To date, the redesign team has reached agreement on many issues, including the scope of CMP and interim processes for: escalation and dispute resolution; product/process change management; exception processing for OSS interfaces, product and process changes; OSS interface change request initiation process; introduction of a new OSS interface; changes to existing OSS interface process; and retirement of an OSS interface.

Qwest has committed to filing monthly updates regarding the status of the redesign effort in this docket as long as the effort is ongoing and this docket is open.<sup>45</sup>

CGE&Y has conducted the required review of Qwest's CMP. Based on its analysis, CGE&Y issued IWOs, which remained open at the time of the workshop. Since the workshop, Qwest has supplemented its responses to these IWOs with information demonstrating that the CMP redesign effort is addressing the issues raised. In addition, CGE&Y has attended both the redesign sessions and the regular monthly CMP meetings.<sup>46</sup> Through Qwest's supplemental responses to the IWOs and CGE&Y's experience in the redesign sessions and regular monthly meetings, Qwest expects that CGE&Y will be able to close the outstanding change management IWOs.

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<sup>44</sup> RME Workshop Transcript Vol. II 252:24-254:2.

<sup>45</sup> RME Workshop Transcript Vol. II 460:16-18.

<sup>46</sup> RME Workshop Transcript Vol. I 179:16-23.

**F. CGE&Y complied with the MTP's requirement to evaluate CEMR in the Functionality Test.**

As it did in the Retail Parity workshop, AT&T waited until the RME was completed to suggest that some aspect of CEMR -- specifically, CEMR training -- should have been evaluated during the RME.<sup>47</sup>

The design of the RME, and the design of every other aspect of the OSS Test, was the subject of extensive discussion between the ACC Staff, Qwest, and the CLECs. AT&T has been an active participant in all of those discussions and has availed itself of the many opportunities to provide its input into the design and conduct of the OSS Test. Indeed, the ACC Staff and CGE&Y have incorporated most of AT&T's suggestions into the design and conduct of the OSS Test. The test design was agreed to by the parties.

In March 2001, AT&T proposed that the MTP be modified to reflect that the maintenance and repair portions of the Functionality Test would be performed on Qwest's Customer Electronic Maintenance and Repair system ("CEMR"), rather than IMA GUI, because CEMR replaced the IMA GUI maintenance and repair system in December 2000. The TAG -- with the full and active participation of AT&T -- discussed how to incorporate CEMR into the OSS Test. The TAG agreed that CEMR would be tested as part of the Functionality Test, but would not be evaluated as part of the RME.<sup>48</sup>

Despite the clear TAG agreement, reached many months ago, AT&T has repeatedly claimed that CGE&Y should have ignored the TAG's agreement regarding how to evaluate CEMR. These claims conflict with the parties' responsibility not to sandbag Qwest, the ACC

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<sup>47</sup> RME Workshop Transcript Vol. II 330:3-11.

<sup>48</sup> See Sedona 271 Test Advisory Group Teleconference Meeting Minutes, Thursday, March 1, 2001 at 2-3.

Staff, and the other TAG members. AT&T itself recognized this responsibility at the Retail Parity workshop:

And if any of the parties have a complaint with how the test is being run or the results of the test, we've had an obligation to share those complaints so that at the end of the process, we'll have gone through it and tempered the results to make them as defensible as possible.<sup>49</sup>

AT&T has repeatedly breached this obligation by waiting until evaluations are complete to claim that aspects of CEMR should have been tested. These claims directly contradict the TAG's agreement to test CEMR only in the Functionality Test. AT&T's after-the-fact attack on CGE&Y for complying with the TAG agreement should be rejected.

**G. Qwest's Stand Alone Test Environment is being evaluated by HP.**

Finally, there was some workshop discussion regarding Qwest's Stand Alone Test Environment ("SATE"). In its RME Report, CGE&Y found that Qwest did not provide an EDI testing environment that mirrors its production environment.<sup>50</sup> This finding formed the basis for an IWO.<sup>51</sup> Qwest implemented SATE on August 1, 2001 to address the concerns raised.<sup>52</sup> Because the incident raised by the IWO was the absence of an EDI testing environment that mirrors the production environment and Qwest's implementation of SATE addressed that issue, the IWO was closed. However, HP has been retained to perform a separate evaluation of Qwest's SATE.<sup>53</sup> Qwest has attached hereto as Exhibit 1 a document entitled "Qwest's Stand Alone Test Environment," which discusses SATE's functionality, the

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<sup>49</sup> Retail Parity Evaluation Workshop Transcript Vol. I 44:9-14.

<sup>50</sup> RME Report at 6.

<sup>51</sup> RME Workshop Transcript Vol. II 362:15-21.

<sup>52</sup> See RME Workshop Transcript Vol. II 362:22-25.

<sup>53</sup> RME Workshop Transcript Vol. II 363:3-5.

separate evaluation of SATE that HP will perform, and evaluations of test environments performed in other jurisdictions.

**IV. CONCLUSION**

In conclusion, CGE&Y has complied with the MTP's requirements in performing and reporting on its evaluation for the RME.

Respectfully submitted this 7<sup>th</sup> day of November, 2001.

By \_\_\_\_\_

  
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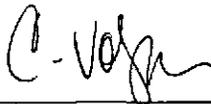
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# **EXHIBIT**

**1**

***Qwest's Stand Alone Test Environment***

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## Introduction

The purpose of this document is to provide an overview of Qwest's Stand Alone Test Environment (SATE) as it compares to test environments implemented by other BOCs (specifically SBC and Verizon), and as it compares to comments made by the FCC in its 271 rulings.

Qwest's SATE was developed based on CLECs' requests for a test deck and is based on test environments successfully established by other BOCs. Qwest's SATE meets the FCC's desire for a stable environment, mirroring production, which facilitates EDI implementation and new release testing.

## Qwest's SATE Overview

Qwest's SATE provides a test environment to CLECs to test their EDI applications against IMA/EDI functionality. SATE provides a relatively unsupervised test environment that does not rely on production systems but, at the same time, interacts with the IMA/EDI user's application in the same manner as IMA EDI production systems. In this capacity, SATE mirrors the production environment in that the functionality is the same as production and the returned data is in the identical fields and format. SATE uses test data, and all requests are subject to the same IMA/EDI edits as those used in production.

Use of SATE is optional for CLECs. It can be used in place of the Interoperability testing. If a CLEC opts to undergo Interoperability Testing, it is not required to use SATE. A CLEC can also opt to use both SATE and Interoperability Testing.

SATE can be used for both new EDI implementation or migration to a new EDI release. CLECs use SATE by completing and passing a standard set of exit criteria. This approach is referred to as 'progression testing.' In progression testing, CLECs must work with Qwest, based on a jointly established project plan. CLECs must follow SATE with Controlled Production prior to approval to utilize the Qwest EDI in full production mode.

SATE can also be used by CLECs to test their software interfaces, to try out new features, functionality, etc. without intent to certify. This type of utilization is referred to as 'regression testing'. In regression testing, CLECs only need to document and communicate their intended testing in a SATE Usage Plan.

The goal of SATE is to provide a test environment, devoid of outside influences, which can be used by CLECs to accomplish the following:

- ✓ Test an EDI application against real IMA functionality, interacting with the SATE user's application in the same manner as IMA EDI production systems
- ✓ Test EDI maps via consistent responses
- ✓ Run pre-order, order, and post-order transactions (including submission and cancellation of supplementals), receiving consistent error messages and successful responses as a result
- ✓ Practice the creation of LSRs via the EDI interface
- ✓ Enable each CLEC to identify areas where its business processes and technology that support its interfaces can be refined

## FCC Comments on Test Environments

The FCC has approved multiple 271 applications that include evaluations of the BOCs' test environments, either through a 3<sup>rd</sup> party evaluation or commercial usage. In these holdings, the FCC defines its expectations of a test environment:

- ✓ A stable testing environment provided to competing carriers to certify that its OSS will be capable of interacting smoothly and effectively with the BOC's OSS. A stable testing environment is defined as an environment where no changes by the BOC are permitted after the testing period commences (FCC Texas Order, FN 350; FCC NY Order FN 301), or where the BOC makes no changes to the proposed release during the test period (FCC Massachusetts Order, Par. 109).
- ✓ The test environment mirrors the production environment in order for competing carriers to test the new release (FCC NY Order, Par. 109). In other words, the test environment adequately mirrors the production environment (FCC KS/OK Order, Par. 168). The test environment can be physically separate from but matches the actual production environment (FCC Mass. Order, Par 110). The test environment need not test response times or flowthrough, or post orders to billing, if the functionality of the test environment is the same as the production environment and returns data in the identical fields and format (FCC TX Order, Par. 138-139).
- ✓ A baseline test deck of representative pre-ordering and ordering transactions (a compilation of transactions designed to test whether a new release produces expected results) with test account data so competing carriers can

test transactions of their choice, and protocols for identifying and resolving issues during testing (FCC NY Order, Fn 305). The test deck should afford competing carriers an opportunity to develop test decks of representative pre-ordering and ordering transactions (FCC TX Order, Par. 134, FCC KS/OK Order, Par. 168, FCC Mass. Order, Par. 109).

- ✓ The test deck offers the extended test periods that CLECs need for EDI implementation and new release testing (FCC TX Order, Par. 134, FCC KS/OK Order, Par. 168, FCC Mass. Order, Par. 109).

Qwest's SATE meets all of the above criteria for a CLEC test environment. Beginning with Release 9.0, SATE releases are implemented 30 days prior to the IMA releases, providing both a stable environment for testing and an available test period prior to a production release for CLECs to test.

SATE was built to provide products and transactions that are currently in demand by the CLEC community and does not support every product and transaction type offered in production. To ensure that CLECs have the functionality available in SATE that they require, Qwest has implemented a CMP process by which additional products and activities can be requested to be added to the current suite of transactions.

SATE's test data is representative data that supports testing of all the products and transactions established in SATE. This pre-defined data allows CLECs to test pre-order, order, and post-order transactions with stable data, ensuring consistent results, and without having to utilize their own customer-specific data. Although this data is robust, CLECs are able to request additional specific test account data through the SATE Data Request process.

The functionality of SATE is the same as production and returns data in the identical fields and format, thus mirroring the production environment.

## Other BOC Test Environments versus Qwest's SATE

Qwest researched other BOC test bed implementations in the design and development of its SATE. Although not identical to either Verizon's environment or SBC's environment, Qwest's SATE is comparable. The following table compares and contrasts available features, functions, and transactions offered to CLECs by SBC, Verizon, and Qwest.

Feature/Functionality	SBC	Verizon	Qwest	Additional Information
Supports Versioning	Y	Y	Y	
Useable for volume testing	N	N	N	
Provides Flow-through	N	Y	N*	*Qwest is currently in the

Feature/Functionality	SBC	Verizon	Qwest	Additional Information
				process of establishing the requirements for Flowthrough in SATE. Implementation dates will be available by mid-November
Measures Performance/Response times	N	N	N	
Allows CLECs to develop custom scripts/scenarios/cases	Y	Y	Y	
Retail Test Data Available	?	Y	Y	
CLEC-specific Test Accounts Available	Y	Y	Y	CLECs are assigned unique test accounts to utilize; test account information not specific to CLEC information in production (RSID/ZSID); this approach ensures CLECs aren't bound to contract for testing.
Functionality available in test environment prior to production release	Y	Y	Y*	*Available 27 days in advance with 8.01; available 30 days in advance with Release 9.0
Maintains CLEC-specific data between releases	?	N	Y	
<b>Pre-Order Transactions</b>				
Address Validation	?	Y	Y	
Appointment Scheduling	?	Y	Y	
Cancel TN	?	Y	Y	
Cancel Appointment	?	Y	Y	
Connecting Facility Assignment	?	N	Y	
Facility Availability	?	Y	Y	
Meet Point Query	?	N	Y	
Raw Loop Data Query	?	Y	Y	
Customer Service Record Query	?	Y	Y	
Service Availability	?	Y	Y	
TN Reservation Query	?	Y	Y	
<b>Order Transactions</b>				
Centrex Plus	?	Y	Y	
Directory Listing Only	?	Y	Y	
Local Number Portability	?	Y	Y	
Loop with Number Portability	?	Y	Y	

Feature/Functionality	SBC	Verizon	Qwest	Additional Information
POTS Resale	?	Y	Y	
Shared Loop	?	Y	Y	
Unbundled Loop	?	Y	Y	
UNE-P Centrex	?	Y	Y	
UNE-P POTS	?	Y	Y	
<b>Status Updates</b>				
FOC	Y	Y	Y*	*Currently manual; automated FOCs will be implemented in Release 9.0
SOC	Y	Y	Y*	*Currently manual; automated SOC's will be implemented in Release 9.0
Rejects	Y	Y	Y*	*Currently manual; automated rejects will be implemented in Release 9.0
Jeopardy Notices	?	?	Y*	*Currently manual; automated jeopardies will be implemented in Release 9.0

As outlined in the table above, Qwest will implement automated post-order transactions with SATE 9.0, and is currently defining the requirements to implement flowthrough activity shortly thereafter. Additionally, in the 10/18/01 CMP meeting, Qwest introduced plans for collaborative test environment requirements sessions. Qwest is currently working with the CLEC community to establish a date within the next few weeks to kick off these sessions. The purpose of the sessions is to collaboratively define the ongoing needs for the test environment.

### **HP's Evaluation of SATE**

HP is evaluating Qwest's SATE as part of the Arizona 271 3<sup>rd</sup> Party Test effort. This evaluation is far more comprehensive than evaluations in other jurisdictions:

- ✓ A review of Qwest's documentation to determine if it provides information that is accurate, sufficient to CLECs' needs, and effective in supporting the CLECs' efforts for testing
- ✓ An evaluation of the SATE processes to determine if they work sufficiently well and are adequately documented for use (this includes employing the CMP process to request an additional product/activity)
- ✓ Transactional testing in releases 7.0, 8.0, and 8.01 to determine if SATE consistently and accurately returns valid responses to correctly and

*incorrectly entered transactions*

- ✓ An evaluation of the extent that Qwest seeks and utilizes CLEC input on specifications and requirements for SATE
- ✓ An evaluation of the extent that Qwest's SATE mirrors the production environment
- ✓ An evaluation of the extent that Qwest's SATE meets HP's established 'principles' for an automated test environment: a mirror of production, accommodation of new release testing, level of CLEC acceptance, and adequacy of test data (this includes using the Data Request Form to request additional test data and perform transactional testing with that data)

### **Other BOC Test Environment Evaluations**

In Texas, Kansas, and Oklahoma, SBC's test environment was evaluated through commercial evidence only, utilizing the experience of the CLECs that exercised the test environment to implement EDI and test against SBC's 1/15/00 release.

In New York, KPMG's evaluation consisted of the following verification activities of commercial usage:

- ✓ Verification and validation of test environment existence and functionality (transactional testing)
- ✓ Verification and validation that the test environment adequately resembles the production environment and that the specifications for the test environment are the same as those in production
- ✓ Verification that the CLECs were notified of changes to the test environment and test tools

(KPMG Retest Steps/Exception 21, KPMG Closure Reports for Exceptions 21 & 22: <http://www.dps.state.ny.us/tel271.htm#KPMG>).

HP's evaluation of Qwest's SATE includes the verification activities above, as well as additional activities such as a documentation evaluation, CLEC questionnaires to determine CLEC input, an evaluation against HP's established principles for an automated test environment, the Data Request process and the monthly test data reset process. Additionally, HP's proposal indicates it will exercise ALL transactions supported by SATE for pre-order, order, and post-

order. This approach far exceeds evaluations of commercial usage employed by other test efforts.

## Conclusion

Qwest has developed SATE based on CLEC requirements and input from other BOCs' successful implementations. SATE is architected to mirror production, to allow CLECs an alternate course for interoperability testing, to provide an extended test period for new release testing, and to employ a robust set of test data to support CLECs in both progression and regression testing. Additionally, Qwest has developed CMP and data request processes by which SATE can continue to evolve to fit CLEC-specific product, transaction, activity, and data requirements.

HP's proposed evaluation is far more robust in design than any other test environment evaluation in any other jurisdiction. Qwest is confident that HP will find that SATE more than meets the requirements set forth by CLECs and the FCC as an adequate testing environment.

## References

The following resources were referenced in the creation of this document:

- ✓ FCC NY Memorandum Opinion and Order  
([http://www.fcc.gov/Bureaus/Common\\_Carrier/in-region\\_applications/bany/welcome.html](http://www.fcc.gov/Bureaus/Common_Carrier/in-region_applications/bany/welcome.html))
- ✓ FCC TX Memorandum Opinion and Order  
([http://www.fcc.gov/Bureaus/Common\\_Carrier/in-region\\_applications/sbctexas2/welcome.html](http://www.fcc.gov/Bureaus/Common_Carrier/in-region_applications/sbctexas2/welcome.html))
- ✓ FCC KS/OK Memorandum Opinion and Order  
([http://www.fcc.gov/Bureaus/Common\\_Carrier/in-region\\_applications/sbcksok/welcome.html](http://www.fcc.gov/Bureaus/Common_Carrier/in-region_applications/sbcksok/welcome.html))
- ✓ FCC Mass Memorandum Opinion and Order  
([http://www.fcc.gov/Bureaus/Common\\_Carrier/in-region\\_applications/verizon\\_mass/welcome.html](http://www.fcc.gov/Bureaus/Common_Carrier/in-region_applications/verizon_mass/welcome.html))
- ✓ KPMG Closure Reports for Exceptions 21 & 22  
<http://www.dps.state.ny.us/tel271.htm#KPMG>

- ✓ HP's SATE Evaluation Proposal ('Evaluation of IMA-EDI SATE Processes and Documentation', V10.0)